

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS FRANK NERI  
(APWU/USPS-T4-16)  
(February 2, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Frank Neri (USPS-T-16). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T4-16 At page 28 of your testimony, you state that the Network Rationalization's plan to reduce the mail processing network "to less than 200 sorting facilities allows for the elimination of AADC and ADC sortation. At origin, mail would be sorted directly to the destinating facility, reducing the number of handling units generated, increasing the density of mail in each handling unit, and reducing the number of handlings each unit must receive."

Your response to TI/USPS-T4-2(b) (filed January 5, 2012) states, however, that:

The Postal Service is still analyzing the role of an ADC sort in the proposed network. Based on the reduction of facilities proposed, there are a significant number of 3-digit ZIP Codes associated with each facility. In some locations, it may be necessary to create scheme separations due to the amount of primary sorting required, which may necessitate the creation of multiple SCF designations within a given facility, along with an ADC role for the overall facility for the volume that cannot be made up to a certain depth.

- a) Please confirm that the statement quoted from page 28 of your testimony refers only to letter-shape mail; and that the "elimination of AADC and ADC sortation" therefore applies only to AADC and ADC sortation of letter-shape mail.
- b) Please confirm that your response to TI/USPS-T4-2(b) that the "Postal Service is still analyzing the role of an ADC sort in the proposed network" does not apply to letter-shape mail, and applies only to Periodicals and other flat-shaped mail.
- c) If your answers to both a) and b) above are other than an unqualified "confirmed," please explain the apparent contradiction between your testimony's statement that the new network will "eliminate AADC and ADC sortation," and your interrogatory response that the Postal Service is "still analyzing the role of an ADC sort in the proposed network."